UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN MILWAUKEE DIVISION

: CIVIL ACTION : MARY McGALLOWAY, Individually and on :

Behalf of All Others Similarly Situated,

Plaintiff,

v. : NO. 2:20-CV-01740-SCD

DEBT RESOLUTION DIRECT LLC d/b/a DEBT ADVISORS OF AMERICA, REDSTONE PRINT & MAILING, INC., and THE DATA SUITE, INC.,

JURY TRIAL DEMANDED

Defendants.

DEFENDANT DEBT RESOLUTION DIRECT, LLC d/b/a DEBT ADVISORS OF AMERICA'S MOTION TO COMPEL PLAINTIFF TO PRODUCE HER CREDIT REPORT

Defendant, Debt Resolution Direct, LLC d/b/a Debt Advisors of America ("Defendant" or "DRD"), by and through its undersigned counsel, respectfully moves this Court to Compel Discovery Responses from Plaintiff, specifically in the production of a consumer report reflecting any credit inquiry by DRD or anyone on its behalf.

Pursuant to Fed. R. Civ. P. 37(a)(1), Defendant served a Discovery Deficiency Letter on Plaintiff on October 27, 2021 (*See* Perr Decl. ¶ 5, Exhibit 4). The parties conferred in good faith regarding Plaintiff's deficient responses by phone on November 5, 2021.

Defendant hereby relies on its Memorandum of Law and supporting exhibits in support of this Motion.

Defendant also has submitted a proposed Order.

Respectfully Submitted:

KAUFMAN, DOLOWICH & VOLUCK, LLP

By: /s/ Richard J. Perr

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Dated: August 12, 2022 Attorneys for Defendant

CERTIFICATE OF SERVICE

I, RICHARD J. PERR, ESQUIRE hereby certify that on this date I served a true and correct copy of the foregoing electronically via CM/ECF on the following:

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_/s/ Richard J. Perr

RICHARD J. PERR, ESQUIRE

Dated: August 12, 2022

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